

\*\*\*\*\*  
HOW TO OBTAIN DOCUMENTS FROM THE OFFICE OF AIR AND RADIATION  
\*\*\*\*\*

The supporting documentation listed in this index is available for public inspection and copying between 8:00 and 5:30 p.m., Monday through Friday, except for Federal holidays, at the following address: U.S. Environmental Protection Agency, Air and Radiation Docket and Information Center (6102), 401 M Street SW, Washington, DC 20460; telephone number: (202) 260-7548, FAX (202) 260-4400.

The docket is located at the above address in Room M-1500, Waterside Mall (ground floor).

Documents may be requested by mail, fax, or telephone. When requesting documents, please provide the docket and item number.

The e-mail address for the Air & Radiation Docket and Information Center is [a-and-r-docket@epamail.epa.gov](mailto:a-and-r-docket@epamail.epa.gov).

Photocopying fees for the public are set by EPA interim policy directed by the Agency's Freedom of Information (FOI) Office. Under this policy the photocopying fee is \$0.15 per page, and no fee will be charged if the total fee is under \$25.00. The first 266 pages are free. However, if more than 266 pages are copied an additional photo duplication free of \$25.00 plus \$0.15 for each page starting with page 267 is charged.

**THIS INDEX IS UP-TO-DATE AS OF 04/28/98**

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-A**  
**EPA Studies or Contractor Reports**

<u>Document No.</u>	<u>Description</u>
II-A-1	Technical Manual: Hood System Capture of Process Fugitive Particulate Emissions, EPA/600/7-86/016, prepared by Research Triangle Institute and Hatch Associates, Limited, for EPA:AEERL under EPA contract no. 68-02-3953, April 1986.
II-A-2	Laboratory and Field Evaluation of a Methodology for Determination of Hydrogen Chloride Emissions From Municipal and Hazardous Waste Incinerators, EPA/600/3-89/064, prepared by Entropy Environmentalists, Incorporated and EPA:AREAL:QAD:SMSB, for EPA:AREAL under EPA contract no. 68-02-4442, April 1989.
II-A-3	OAQPS Control Cost Manual, 4th ed., EPA 450/3-90-006, EPA:OAQPS, January 1990.
II-A-4	Program Users Manual for Estimates of CEMS and Annual O&M Costs for New and Existing Combustion Facilities, prepared by Entropy Environmentalists, Incorporated, for EPA:EMB under EPA contract no. 68-D90055, March 21, 1991.
II-A-5	Report, The Measurement Solution: Using a Temporary Total Enclosure for Capture Efficiency Testing, EPA publication no. EPA-450/4-91-020, prepared by Midwest Research Institute, under contract no. 68-D0-0137, August 1991.
II-A-6	Site-Specific Test Plan and Quality Assurance Project Plan: Inland Steel Company, East Chicago, Indiana, prepared by Roy F. Weston, Incorporated for EPA:EMB under EPA contract no. 68-D10104, October 1991.
II-A-7	Draft report, Technologies for Controlling Emissions from Hydrochloric Acid Pickling Operations in the Iron and Steel Industry-Current Practices, prepared by Midwest Research Institute, for EPA:ISB, October 17, 1991.
II-A-8	Emission test report for pickle line no. 4, Inland Steel Company, East Chicago, Indiana, prepared by Roy F. Weston, Incorporated for EPA:EMB under EPA contract no. 68-D10104, December 1991.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-A**  
**EPA Studies or Contractor Reports**

<u>Document No.</u>	<u>Description</u>
II-A-9	Documentation for Developing the Initial Source Category List: Final Report, EPA:OAQPS, EPA-450/3-91-030, July 1992, pp. 3-6 and A-17.
II-A-10	Site-specific test plan and quality assurance project plan: WCI Steel, Incorporated, Warren, Ohio, prepared by Roy F. Weston, Incorporated for EPA:EMB under EPA contract no. 68-D10104, August 1992.
II-A-11	Site-Specific Test Plan: Worthington Steel Company, Incorporated, Porter, Indiana, prepared by Energy and Environmental Research Corporation for EPA:EMB under EPA contract no. 68-D20164, April 1993.
II-A-12	Site-Specific Test Plan: Acme Steel Company, Riverdale, Illinois, prepared by Energy and Environmental Research Corporation for EPA:EMB under EPA contract no. 68-D20164, April 1993.
II-A-13	Emission Test Report for Acme Steel Company, Riverdale, Illinois, prepared by Energy and Environmental Research Corporation for EPA:EMB under EPA contract no. 68-D10104, December 1993.
II-A-14	Emission Test Report for Worthington Steel Company, Incorporated, Porter, Indiana, prepared by Energy and Environmental Research Corporation for EPA:EMB under EPA contract no. 68-D10104, December 1993.
II-A-15	Emission Test Report for Warren Consolidated Industries (WCI), Incorporated, Warren, Ohio, prepared by Energy and Environmental Research Corporation for EPA:EMB under EPA contract no. 68-D10104, February 10, 1994.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-B**  
**EPA Factual Memoranda**

<u>Document No.</u>	<u>Description</u>
II-B-1	Memorandum, J. Crowder, EPA:ISB, to G. Wood, EPA:EMB, August 22, 1991, Emission test request for Inland Steel Company, East Chicago, Indiana.
II-B-2	Memorandum, E. Kong, Research Triangle Institute, to J. Maysilles, EPA:ISB, January 23, 1992, Test completion notice and final draft trip report for Inland Steel Company, East Chicago, Indiana.
II-B-3	A. Trenholm and D. March, Midwest Research Institute, to J. Maysilles, EPA:ISB, February 11, 1992, Site visit report for LTV, East Chicago, Indiana.
II-B-4	Letter, E. Kong, Research Triangle Institute, to J. Maysilles, EPA:ISB, February 28, 1992, Current findings of State and local regulations regarding HCl emission from steel pickling operations.
II-B-5	Trip report, visit to Kasle Steel Corporation, Dearborne, MI, April 30, 1992 (Considered to be Confidential Business Information).
II-B-6	Trip report, visit to Worthington Steel Company, Porter, IN, May 25, 1992 (Considered to be Confidential Business Information).
II-B-7	Memorandum, J. Crowder, EPA:ISB, to G. Wood, EPA:EMB, June 15, 1992, Emission test request for WCI Steel, Incorporated in Warren, Ohio (Memorandum, E. Kong and J. Turner, Research Triangle Institute, to J. Maysilles, EPA:ISB, June 8, 1992, Recommendation for Emissions Test at WCI Steel, Incorporated, Warren, Ohio attached).
II-B-8	Trip report, visit to National Steel, Encorse, MI, June 25, 1992 (Considered to be Confidential Business Information).
II-B-9	Memorandum, J. Crowder, EPA:ISB, to G. Wood, EPA:EMB, July 1, 1992, Emission test request for Acme Steel Company in Riverdale, Illinois (Memorandum, E. Kong, Research Triangle Institute, to J. Maysilles, EPA:ISB, July 1, 1992, Recommendation for Emission Tests at ACME Steel Company, Riverdale, Illinois attached).

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-B**  
**EPA Factual Memoranda**

<u>Document No.</u>	<u>Description</u>
II-B-10	Trip report, visit to I/N TEK, South Bend, IN, on June 4, 1992, August 11, 1992 (Considered to be Confidential Business Information).
II-B-11	Trip report, visit to Valley City Steel, Valley City, Ohio, on May 5, 1992, August 14, 1992 (Considered to be Confidential Business Information).
II-B-12	Memorandum, E. Kong, Research Triangle Institute, to J. Maysilles, EPA:ISB, August 20, 1992, Site visit report for WCI Steel Incorporated, Warren, Ohio.
II-B-13	Memorandum, E. Kong, Research Triangle Institute, to J. Maysilles, EPA:ISB, August 20, 1992, Site visit report for LTV Cleveland Works.
II-B-14	Memorandum, E. Kong, Research Triangle Institute, to J. Maysilles, EPA:ISB, August 21, 1992, Site visit report for Acme Steel Company, Riverdale, Illinois (Memorandum, J. Crowder, EPA:ISB, to D. Holmberg, ACME Steel, September 8, 1992, Enclosing final site visit report attached).
II-B-15	Memorandum, E. Kong, Research Triangle Institute, to J. Maysilles, EPA:ISB, August 24, 1992, Source Test Plan, NESHAP for Steel Pickling–HCl Process.
II-B-16	Memorandum, J. Crowder, EPA:ISB, to G. Wood, EPA:EMB, October 21, 1992, Emission test request for Worthington Steel Company in Porter, Indiana (Memorandum, E. Kong, Research Triangle Institute, to J. Maysilles, EPA:ISB, Recommendation for Emission Tests at Worthington Steel Company, Porter, Indiana attached).
II-B-17	Memorandum, E. Kong, Research Triangle Institute, to J. Maysilles, EPA:ISB, November 30, 1992, Revised test completion notice: WCI Steel, Warren, Ohio.
II-B-18	Memorandum, E. Kong, Research Triangle Institute, to J. Maysilles, EPA:ISB, December 11, 1992, Final site visit report for USS-Posco, Pittsburg, California.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-B**  
**EPA Factual Memoranda**

<u>Document No.</u>	<u>Description</u>
II-B-19	Memorandum, E. Kong, Research Triangle Institute, to J. Maysilles, EPA:ISB, December 17, 1992, Emission test request for USS-Posco in Pittsburg, California; Attached is Memorandum, E. Kong, Research Triangle Institute, to J. Maysilles, EPA:ISB, Recommendation for Emissions Tests at USS-Posco, Pittsburg, California.
II-B-20	Trip report, visit to USS-Posco Industries, Pittsburg, California, on July 9, 1992, February 1, 1993 (Considered to be Confidential Business Information).
II-B-21	Cost estimates generated on February 11, 1993, from CEM cost model for a continuous emission monitor for HCl and a flow meter (Attached is "Program Users Manual for Estimates of CEMS and Annual O&M Costs for New and Existing Combustion Facilities," prepared by Entropy Environmentalists, Incorporated for EPA:EMB, Contract No. 68D90055, dated March 21, 1991 attached).
II-B-22	Trip report, visit to Goodyear Tire & Rubber Company, Randleman, North Carolina, on October 15, 1992, February 15, 1993 (Considered to be Confidential Business Information).
II-B-23	Memorandum, E. Kong, Research Triangle Institute, to J. Maysilles, EPA:ISB, February 23, 1993, Assessment of the existing test results.
II-B-24	Memorandum, E. Kong, Research Triangle Institute, to J. Maysilles, EPA:ISB, March 12, 1993, Validation of existing test results.
II-B-25	Memorandum, E. Kong, Research Triangle Institute, to J. Maysilles, EPA:ISB, March 18, 1993, Preliminary evaluation of Demister Performance Steel Pickling–NESHAP.
II-B-26	Memorandum, E. Kong, Research Triangle Institute, to J. Maysilles, EPA:ISB, March 24, 1993, Revision of data analysis for nine valid test results.
II-B-27	Memorandum, E. Kong, Research Triangle Institute, to J. Maysilles, EPA:ISB, May 19, 1993, Test completion notice: Worthington Steel Company, Porter, Indiana.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-B**  
**EPA Factual Memoranda**

<u>Document No.</u>	<u>Description</u>
II-B-28	Memorandum, E. Kong, Research Triangle Institute, to J. Maysilles, EPA:ISB, May 19, 1993, Test completion notice: Acme Steel Company, Riverdale, Illinois.
II-B-29	Trip report, visit to Magnetics International, Incorporated, Burns Harbor, Indiana, on March 26, 1992, May 20, 1993 (Considered to be Confidential Business Information).
II-B-30	Memorandum, E. Kong, Research Triangle Institute, to J. Maysilles, EPA:ISB, June 9, 1993, Status report on Kimre Demister installation Steel Pickling - NESHAP.
II-B-31	Memorandum, E. Kong, Research Triangle Institute, to J. Maysilles, EPA:ISB, September 14, 1993, Analyses of performance capabilities of control techniques for coil pickling operations and spray roasting acid regeneration processes.
II-B-32	Memorandum, E. Kong and J. Turner, Research Triangle Institute, to J. Maysilles, EPA:ISB, October 26, 1993, Comparison of Esco pickling tank emission estimator program with tests at WCI Corporation.
II-B-33	Memorandum, J. Turner, Research Triangle Institute, to J. Maysilles, EPA:ISB, February 15, 1994, Comparison of Esco emission model with existing acid pickling lines.
II-B-34	Memorandum, J. Turner, Research Triangle Institute, to J. Maysilles, EPA:ESD:MG, June 28, 1995, Enhanced monitoring options for Steel Pickling - HCl Process NESHAP.
II-B-35	Memorandum, M. Ciolek, EPA:ELM, to J. Maysilles, EPA:ISB, August 2, 1994, Comments on Clean Air Engineering Draft Report on HCl and Chlorine Removal Efficiency Testing.
II-B-36	Memorandum, J. Turner, Research Triangle Institute, to J. Maysilles, EPA:ESD:MG, September 8, 1995, Acid regeneration plant information.
II-B-37	Memorandum, J. Turner, Research Triangle Institute, to J. Maysilles, EPA:ESD:MG, April 29, 1996, Small businesses in the pickling industry.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-B**  
**EPA Factual Memoranda**

<u>Document No.</u>	<u>Description</u>
II-B-38	Memorandum, J. Maysilles, EPA:ESD:MG, to A. Vervaert, EPA:ESD:MG, July 24, 1996, Comments from State and local agencies to the presumptive MACT determination for the steel pickling HCl process NESHAP.
II-B-39	Memorandum, J. Turner, Research Triangle Institute, to L. Chappell, EPA:ASSD:ISEG: and J. Maysilles, EPA:ESD:MG, August 13, 1996, Source of steel prices and cost treatment of acid regeneration plants -- Steel pickling - NESHAP.
II-B-40	Memorandum, J. Turner, Research Triangle Institute, to J. Maysilles, EPA:ESD:MG, September 23, 1996, Revisions to BID and ICR, steel pickling - NESHAP.
II-B-41	Memorandum, J. Turner, Research Triangle Institute, to J. Maysilles, EPA:ESD:MG, November 12, 1996, Continuous Monitors for chlorine or chlorine and HCl, steel pickling - NESHAP.
II-B-42	Memorandum, J. Turner, Research Triangle Institute, to J. Maysilles, December 23, 1996, Revisions to continuous monitoring options and costs in Chapter 7 of the Steel Pickling BID document.
II-B-43	Memorandum, J. Turner, Research Triangle Institute, to J. Maysilles, EPA:ISB, January 27, 1997, Emissions and costs for scrubber outlet concentrations at 3 percent.
II-B-44	Memorandum and attachment, J. Turner, Research Triangle Institute, to J. Maysilles, EPA:ISB, May 23, 1997, Emissions and costs for batch plant scrubber outlet concentrations at 3 percent (Memorandum, J. Turner, Research Triangle Institute, to J. Maysilles, EPA:ISB, January 27, 1997, Emissions and costs for scrubber outlet concentrations at 3 percent attached).
II-B-45	Memorandum and attachment, J. Turner, Research Triangle Institute, to Docket, May 29, 1997, Revised Table 5b, Emission Control Data.



**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-C**  
**EPA Correspondence to Outside Persons**

<u>Document No.</u>	<u>Description</u>
II-C-1	E. Kong, Research Triangle Institute, to J. Carson, Inland Steel Company, December 13, 1991, Enclosing materials to be used for process observations during emission test.
II-C-2	E. Kong, Research Triangle Institute, to M. Mann, Inland Steel company, December 26, 1991, Requesting information on capital investment needed for indirect heat exchange on pickling lines.
II-C-3	J. Crowder, EPA:ISB, to J. Carson, Inland Steel Company, January 30, 1992, Enclosing draft trip report for review (for final report, see II-B-2) (Considered to be Confidential Business Information).
II-C-4	B.L. France, Research Triangle Institute, R. Herman, Sharon Steel Corporation, May 28, 1992, requesting recent stack test from the regeneration facility.
II-C-5	B. Jordan, EPA:ESD, to C. Moore, Worthington Steel Malvern, June 15, 1992, Transmitting section 114 information collection request (mailing list and enclosures attached).
II-C-6	E. Kong, Research Triangle Institute, to T. Shepker, WCI Steel, Incorporated, June 23, 1992, Transmitting memorandum concerning confidentiality of information collected during May 7, 1992, site visit.
II-C-7	J. Crowder, EPA:ISB, to K. Lenti, Magnetics International, Incorporated, July 8, 1992, Enclosing draft trip report for review (for final report, see II-B-29).
II-C-8	J. Crowder, EPA:ISB, to M. Mittleman, Kasle Steel Corporation, July 8, 1992, Enclosing draft trip report for review (for final report, see II-B-5).
II-C-9	J. Crowder, EPA:ISB, to D. Hemmelgarn, Worthington Steel Company, July 22, 1992, Enclosing draft trip report for review (for final report, see II-B-6).
II-C-10	J. Crowder, EPA:ISB, to D. Holmberg, Acme Steel Company, July 24, 1992, Enclosing draft drip report for review (for final report, see II-B-14).

**Docket No. A-95-43**  
**HCI Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-C**  
**EPA Correspondence to Outside Persons**

<u>Document No.</u>	<u>Description</u>
II-C-11	J. Crowder, EPA:ISB, to D. Gould, National Steel, August 21, 1992, Enclosing draft trip report for review (for final report, see II-B-8).
II-C-12	J. Crowder, EPA:ISB, to L. Kilgore, Valley City Steel, September 2, 1992, Enclosing draft trip report for review (for final report, see II-B-11).
II-C-13	J. Crowder, EPA:ISB, to T. Shepker, WCI Steel, September 2, 1992, Enclosing draft trip report for review (for final report, see II-B-12).
II-C-14	J. Crowder, EPA:ISB, to R. Callihan, LTV Steel, September 2, 1992, Enclosing draft trip report for review (for final report, see II-B-13).
II-C-15	J. Crowder, EPA:ISB, to K. McMahon, USS-Posco Industries, September 16, 1992, Enclosing draft trip report for review (for final report, see II-B-20).
II-C-16	J. Crowder, EPA:ISB, to D. Galloway, Goodyear Tire & Rubber Company, March 2, 1993, Enclosing draft trip report for review (for final report, see II-B-22).

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-D**  
**EPA Correspondence From Outside Persons**

<u>Document No.</u>	<u>Description</u>
II-D-1	M. Dicen, Indiana Department of Environmental Management, to J. Maysilles, EPA:ESD, July 26, 1991, Enclosing (1) "Testing Plan for Compliance Particulate and VOC Emission Testing at Nucor Steel In Crawfordsville, Indiana," dated July 8, 1991; (2) "Engineering Particulate Emissions Testing on the HCl Pickle Lines at Indiana," test date, April 3, 1991; (3) Application for Operating Permit at Nucor Steel, Crawfordsville, Indiana, January 24, 1989; and (4) Supporting documentation for operating permit application, January 31, 1989.
II-D-2	W. Schott, Kimre, Incorporated, to J. Maysilles, EPA:ISB, July 31, 1991, Discussing HCl condensation aerosol removal (Paper, "Hydrochloric Acid Aerosol Formation by the Interaction of Hydrogen Chloride with Humid Air," two German papers (not translated), and mist eliminator product brochure attached).
II-D-3	J. Carson, Inland Steel Company, to J. Maysilles, August 16, 1991, Enclosing information on pickling line.
II-D-4	W. Riley, Bethlehem Steel Corporation, to B. Jordan, EPA:ESD, September 10, 1991, Enclosing information on pickling line.
II-D-5	J.N. Stone, Esco Engineering, to J. Cole, Research Triangle Institute, November 13, 1991, Enclosing information on current pickling practices.
II-D-6	J. N. Stone, Esco Engineering, to J. Cole, Research Triangle Institute, November 21, 1991, Enclosing additional information on air emission from pickling.
II-D-7	C. Hansotte, USS Technical Center, to J. Maysilles, EPA:ESD, December 20, 1991, Enclosing May 1990 report, "Determination of the HCl Scrubber Efficiency for the 56" and "84 Pickle Lines" by Keystone Environmental Resources (Memorandum, T. Harrison, EPA:EMB, to J. Maysilles, EPA:ISB, July 31, 1992, Review of USX Irving Pickling Lines Test Report attached).

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-D**  
**EPA Correspondence From Outside Persons**

<u>Document No.</u>	<u>Description</u>
II-D-8	G. Eskstein, Allegheny Ludlum Steel, to E. Kong, Research Triangle Institute, January 3, 1992, Enclosing May 1987 test report, "Wet Scrubber Atmospheric Control Efficiencies for Sulfuric, Nitric, and Hydrofluoric Acids and Respective Scrubber Outlet Mass Flow Rates at Allegheny Ludlum Corporation, New Castle, Indianan" by Robert B. Jacko Environmental Consulting Engineers.
II-D-9	M. Mann, Inland Steel Company, to E. Kong, Research Triangle Institute, January 10, 1992, Transmitting cost data and information on various uses of coil strip.
II-D-10	M. Mann, Inland Steel Company, to E. Kong, Research Triangle Institute, January 15, 1992, Transmitting capital cost data for indirect heat exchanger on pickling line.
II-D-11	B. Raney, Metropolitan Government of Nashville and Davidson County, to C. Bullock, Research Triangle Institute, January 15, 1992, Enclosing HCl test results for scrubber exhaust stack at Cargill Wire and Steel in Nashville, Tennessee.
II-D-12	R. Sisneros, Kasle Steel Corporation, to E. Kong, Research Triangle Institute, January 22, 1992, Enclosing information on 1991 HCl emission study on wet scrubber at Dearborn, Michigan facility.
II-D-13	D. R. Merrill, Tri-Mer Corporation, to E. Kong, Research Triangle Institute, February 3, 1992, Enclosing information and literature concerning fume scrubber systems for steel pickling operations.
II-D-14	C. Groessl, Arus Andritz-Ruthner, Incorporated, to E. Kong, Research Triangle Institute, February 21, 1992, Enclosing pickling technical brochures.
II-D-15	L. Kilgore, Valley City Steel, to E. Kong, Research Triangle Institute, February 25, 1992, Enclosing stack test results for regeneration system and pickle line scrubber and descriptive information on processes.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-D**  
**EPA Correspondence From Outside Persons**

<u>Document No.</u>	<u>Description</u>
II-D-16	B. J. Lerner, Beco Engineering Company, B. France, Research Triangle Institute, February 25, 1992, Enclosing background information on Beco Engineering's capabilities in acid gas removal in steel pickling.
II-D-17	L. Hansen, Hansen Engineering, to E. Kong, Research Triangle Institute, February 27, 1992, Enclosing information on inline stack scrubber, HCl and NO <sub>x</sub> /SO <sub>x</sub> , and test data by Cargill Steel (see II-D-11) and Wire (attached).
II-D-18	D. Holmberg, Acme Steel Company, to E. Kong, Research Triangle Institute, March 12, 1992, Transmitting "Gaseous Emission Study Performed for Acme Steel Company at the Riverdale, Illinois Plant Pickling Line Scrubbers (Units 1 and 2)," Mostardi-Platt Associates, Incorporated, December 26, 1990.
II-D-19	R. Holcombe, Gulf States Steel, to E. Kong, Research Triangle Institute, March 25, 1992, Enclosing test report, HCl Efficiency Studies Conducted on the Inlet and Outlet of the Pickle Line Scrubber Located in Gadsden, Alabama for Gulf States Steel Corporation on September 27, 1991" by Guardian Systems.
II-D-20	R. Walker, Bay Area Air Quality Management District, to C. Bullock, Research Triangle Institute, March 31, 1992, Transmitting USS-Posco emission inventory report.
II-D-21	D. Poulsen, California Steel Industries, Incorporated, to E. Kong, Research Triangle Institute, April 3, 1992, Responding to request for HCl emission source data and enclosing 1989 test report on HCl and sodium hydroxide emissions from scrubber inlet and outlet for pickling line by Truesdail Laboratories.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-D**  
**EPA Correspondence From Outside Persons**

<u>Document No.</u>	<u>Description</u>
II-D-22	K. McMahon, USS-Posco Industries, to E. Kong, Research Triangle Institute, April 30, 1992, Enclosing five emission tests: (1) Determination of HCl Emissions and HCl Removal Efficiency of the Pickle Line Tanks Scrubber at USS-Posco Industries, Pittsburgh, California, EcoServe Environmental Services, dated September 12, 1989; (2) Determination of Particulate Emissions from the Pickle Line Tanks Scrubber Exhaust Stack at USS-Posco Industries, Pittsburgh, California, EcoServe Environmental Services, dated September 10, 1989; (3) USS-Posco Industries HCl Regeneration Plant Scrubber - TSP and HCl Emissions Testing, EcoServe Environmental Services, 1989 (4 pages); (4) Source Test Report USS-Posco 7117 (test of scrubber for Pittsburgh, California mill using CARB 421), Brown and Caldwell Consultants, dated November 20, 1992; and (5) Report of Particulate Testing and Analysis for the USS-Posco Industries Modernization Program, Pittsburgh, California.
II-D-23	General Cable Corporation, Indiana Steel and Wire Company plant (no cover letter attached), to B. Jordan, EPA:ESD, May 12, 1992, ICR response.
II-D-24	E. Keifer, WCI Steel, to E. Kong, Research Triangle Institute, May 15, 1992, Transmitting XERXES quotes for no. 5 pickler fume scrubber.
II-D-25	E. Keifer, WCI Steel, to E. Kong, Research Triangle Institute, May 22, 1992, Transmitting information on fume exhaust system for no. 6 pickle line.
II-D-26	D. Calderwood, WCI Steel, to E. Kong, Research Triangle Institute, May 27, 1992, Transmitting information on air pollution control equipment.
II-D-27	D. Poulsen, California Steel Industries, Incorporated, to E. Kong, Research Triangle Institute, May 29, 1992, Enclosing information on CSI ferrous chloride facility and paper entitled, "Recycling's Revenue Path: Acid Wastes Become Profits," R.J. Stainer and D.R. Poulson, presented at HAZTECH International, Houston, Texas, May 8-10, 1990.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-D**  
**EPA Correspondence From Outside Persons**

<u>Document No.</u>	<u>Description</u>
II-D-28	D. Hartong, National Steel, to E. Kong, Research Triangle Institute, June 5, 1992, Enclosing test report, "Hydrogen Chloride Emissions Study Performed for National Steel Corporation, Great Lakes Division in Ecorse, Michigan on the Pickle Line Scrubbers on June 6-7, 1990" by WW Engineering & Science and additional background information.
II-D-29	A. Ryon, Sherman Wire-East Plant, to B. Jordan, EPA:ESD, June 8, 1992, ICR response.
II-D-30	V. L. Reese, Teledyne Incorporated, Teledyne Pittsburgh Tool Steel plant, to B. Jordan, EPA:ESD, June 8, 1992, ICR response.
II-D-31	K. Lenti, Magnetics International, Incorporated, to E. Kong, Research Triangle Institute, June 9, 1992, Enclosing information on procedure for analyzing total iron and free hydrochloric acid in spent pickle liquor.
II-D-32	A. Ryon, Sherman Wire-West Plant, to B. Jordan, EPA:ESD, June 11, 1992, ICR response.
II-D-33	K. Calhoun, Thomas Steel Strip Corp., to B. Jordan, EPA:ESD, June 11, 1992, ICR response.
II-D-34	P. Sato, Meiburger Environmental Services, Incorporated, to J. Maysilles, EPA:ISB, June 11, 1992, ICR response for Heidtman Steel Products, Incorporated and Wilmington Coil, HS Processing plant.
II-D-35	P. Sato, Meiburger Environmental Services, Incorporated, to J. Maysilles, EPA:ISB, June 11, 1992, ICR response for Heidtman Steel Products, Incorporated-Bedford Division.
II-D-36	M. Koch, QSource Engineering, Incorporated, to E. Kong, Research Triangle Institute, June 11, 1992, Enclosing stack test report for Valley City Steel pickling operation and field service reports.
II-D-37	Rogers Galvanizing Co. (no cover letter attached), to B. Jordan, EPA:ESD, June 12, 1992, ICR response.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-D**  
**EPA Correspondence From Outside Persons**

<u>Document No.</u>	<u>Description</u>
II-D-38	Western Tube & Conduit, Long Beach, California plant (no cover letter attached), to B. Jordan EPA:ESD, June 12, 1992, ICR response.
II-D-39	L. Sarna, Armco Inc., Empire Detroit Steel Plant, to B. Jordan, EPA:ESD, June 15, 1992, ICR response.
II-D-40	A. Ryon, Sherman Wire of Caldwell, to B. Jordan, EPA:ESD, June 16, 1992, ICR response.
II-D-41	C.G. Seiz, Steel Processing, Incorporated, to B. Jordan, EPA:ESD, June 16, 1992, ICR response.
II-D-42	D. Layman, Bethlehem Steel Corporation, Bar, Rod & Wire Division, to B. Jordan, EPA:ESD, June 17, 1992, ICR response.
II-D-43	G. Lanz, Granite City Pickling & Warehousing, Incorporated, to B. Jordan, EPA:ESD, June 19, 1992, ICR response.
II-D-44	C. Hund, CF&I Steel Corporation, to B. Jordan, EPA:ESD, June 19, 1992, ICR response.
II-D-45	Cargill Steel and Wire (no cover letter attached), to B. Jordan, EPA:ESD, June 19, 1992, ICR response (Emission test, "Determination of Filterable Particulate and Hydrogen Chloride Emissions from Carbon Steel Acid Cleaning Process Packed Scrubber," Resource Consultants, Incorporated attached).
II-D-46	R. Ortega, National Processing Company, to B. Jordan, EPA:ESD, June 19, 1992, ICR response.
II-D-47	A. Hall, Wheatland Tube Company (Maneely-Illinois, Incorporated), to B. Jordan, EPA:ESD, June 19, 1992, ICR response.
II-D-48	D. Bennington, Keystone Steel & Wire Company, to B. Jordan, EPA:ESD, June 19, 1992, ICR response.



**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-D**  
**EPA Correspondence From Outside Persons**

<u>Document No.</u>	<u>Description</u>
II-D-49	American Spring Wire Corporation, Kankakee, Illinois plant (no cover letter attached), to B. Jordan, EPA:ESD, June 22, 1992, ICR response (Monthly Drager Tube Test: Cleaning House Fume Scrubber, American Spring Wire Corporation, Kankakee, Illinois, January 2, 1991 attached).
II-D-50	Goodyear Tire & Rubber Co. (no cover letter attached), to B. Jordan, EPA:ESD, June 22, 1992, ICR response.
II-D-51	American Spring Wire Corporation, Bedford height, Ohio plant (no cover letter attached), to B. Jordan, EPA:ESD, June 22, 1992, ICR response.
II-D-52	E. Kong, Research Triangle Institute, to J. Maysilles, EPA:OAQPS:ISB, June 22, 1992, Concerning nonconfidentiality of information received during site visit.
II-D-53	National Galvanizing, Incorporated (no cover letter attached), to B. Jordan, EPA:ESD, June 23, 1992, ICR response.
II-D-54	Smith Industries (no cover letter attached), to B. Jordan, EPA:ESD, June 23, 1992, ICR response.
II-D-55	AMAC Enterprises, Incorporated (no cover letter attached), to B. Jordan, EPA:ESD, June 23, 1992, ICR response.
II-D-56	INSTEEL Industries, Incorporated, Rappahannock Wire Company plant (no cover letter attached), to B. Jordan, EPA:ESD, June 23, 1992, ICR response.
II-D-57	Gulf Coast Galvanizing, Incorporated (no cover letter attached), to B. Jordan, EPA:ESD, June 23, 1992, ICR response.
II-D-58	Toledo Pickling and Steel Sales, Incorporated (no cover letter attached), to B. Jordan, EPA:ESD, June 25, 1992, ICR response.
II-D-59	Kasle Steel Corporation, Pickling Division (no cover letter attached), to B. Jordan, EPA:ESD, June 25, 1992, ICR response.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-D**  
**EPA Correspondence From Outside Persons**

<u>Document No.</u>	<u>Description</u>
II-D-60	S. Felton, Armco Steel Company - Middletown Works, to B. Jordan, EPA:ESD, June 29, 1992, ICR response (Memorandum, F.E. Rower, Armco, to D.J. Francis, Middletown Works, Evaluation of HCl Fume Scrubber Systems–Middletown Works [interim report], August 18, 1983 attached).
II-D-61	K. Bonninger, Keystone Seneca Wire Cloth Company, to B. Jordan, EPA:ESD, June 30, 1992, ICR response.
II-D-62	Trinity Industries (no cover letter attached), to B. Jordan, EPA:ESD, June 30, 1992, ICR response.
II-D-63	J. VanKirk, Copperweld Steel Co., to B. Jordan, EPA:ESD, June 30, 1992, ICR response.
II-D-64	Western Tube & Conduit Corporation, Omega Tube & Conduit Corporation Plant (no cover letter attached), to B. Jordan, EPA:ESD, July 1992, ICR response.
II-D-65	National-Standard Company, Columbiana, Alabama plant (no cover letter attached), to B. Jordan, EPA:ESD, July 1992, ICR response.
II-D-66	Carpenter Technology Corporation, Orangeburg Plant (no cover letter attached), to B. Jordan, EPA:ESD, July 1992, ICR response (Emission test, "Source Test Report for Carpenter Technology," Environmental Source Samplers, Incorporated attached).
II-D-67	Carpenter Technology Corporation, Reading Plant (no cover letter attached), to B. Jordan, EPA:ESD, July 1992, ICR response (Emission test, "Scrubber Emissions Evaluation Test Report," Roy F. Weston, Incorporated attached).
II-D-68	Acme Steel Company (no cover letter attached), to B. Jordan, EPA:ESD, July 1992, ICR response.
II-D-69	Nucor Corporation, Nucor Steel (no cover letter attached), to B. Jordan, EPA:ESD, July 1, 1992, ICR response.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-D**  
**EPA Correspondence From Outside Persons**

<u>Document No.</u>	<u>Description</u>
II-D-70	S. Felton, Armco Steel Company, Armco Ashland Works plant, to B. Jordan, EPA:ESD, July 1, 1992, ICR response.
II-D-71	D. Poulsen, California Steel Industries, to B. Jordan, EPA:ESD, July 1, 1992, ICR response (Sample Analysis Test Report for Hydrochloric Acid and Sodium Hydroxide from Inlet and Outlet of Scrubbers Serving 2 Picklers and Exhaust of Cleaning Line, Truesdail Laboratories, Incorporated, October 31, 1989 attached).
II-D-72	R. Herman, Sharon Steel Corporation, to B. Jordan, EPA:ESD, July 1, 1992, ICR response.
II-D-73	W. Samples, Wheeling Pittsburgh Steel Corporation, Yorkville plant, to B. Jordan, EPA:ESD, July 2, 1992, ICR response.
II-D-74	W. Samples, Wheeling Pittsburgh Steel Corporation, Allenport plant, to B. Jordan, EPA:ESD, July 2, 1992, ICR response.
II-D-75	W. Samples, Wheeling Pittsburgh Steel Corporation, Steubenville North plant, to B. Jordan, EPA:ESD, July 2, 1992, ICR response.
II-D-76	W. Samples, Wheeling Pittsburgh Steel Corporation, Martins Ferry plant, to B. Jordan, EPA:ESD, July 2, 1992, ICR response.
II-D-77	Voss Steel (no cover letter attached), to B. Jordan, EPA:ESD, July 2, 1992, ICR response.
II-D-78	G. Lerman, Steel Warehouse Company, Incorporated, to B. Jordan, EPA:ESD, July 2, 1992, ICR response.
II-D-79	W. S. Kirkpatrick, Mt. Joy Wire Corporation, to J. Maysilles, EPA:ISB, July 2, 1992, ICR response (Emission test, "Source Sampling Report for Measurement of HCl and Lead Emissions," Gilber/ Commonwealth, Incorporated attached).
II-D-80	G. P. Current, Weirton Steel Corporation, to B. Jordan, EPA:ESD, July 2, 1992, ICR response.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-D**  
**EPA Correspondence From Outside Persons**

<u>Document No.</u>	<u>Description</u>
II-D-81	Indiana Pickling & Processing Co. (no cover letter attached), to B. Jordan, EPA:ESD, July 6, 1992, ICR response.
II-D-82	D. Braden, Greer Steel Company, Dover plant, to B. Jordan, EPA:ESD, July 7, 1992, ICR response.
II-D-83	Samuel-Whittar Incorporated (no cover letter attached), to B. Jordan, EPA:ESD, July 8, 1992, ICR response.
II-D-84	National Standard Co. (no cover letter attached), to B. Jordan, EPA:ESD, July 8, 1992.
II-D-85	R. Spence, U.S. Department of Energy, Oak Ridge (Y-12) plant, to B. Jordan, EPA:ESD, July 9, 1992, ICR response.
II-D-86	D. Hall, Teledyne Vasco, C-K Company plant, to J. Maysilles, EPA:OAQPS, July 14, 1992, ICR response.
II-D-87	R. Snyder, Samuel Steel Pickling Company, to B. Jordan, EPA:ESD, July 16, 1992, ICR response.
II-D-88	M. Harmon, LTV Steel Company, Hennepin Works plant, to B. Jordan, EPA:ESD, July 16, 1992, ICR response.
II-D-89	M. Harmon, LTV Steel Company, Cleveland Works plant, to B. Jordan, EPA:ESD, July 16, 1992, ICR responses.
II-D-90	M. Harmon, LTV Steel Company, Indiana Harbor Works plant, to B. Jordan, EPA:ESD, July 16, 1992, ICR responses.
II-D-91	J.C. Skalon, Allied Tube & Conduit Corporation, to B. Jordan, EPA:ESD, July 17, 1992, ICR response.
II-D-92	J.C. Skalon, Allied Tube & Conduit, Philadelphia Division, to B. Jordan, EPA:ESD, July 17, 1992, ICR response.
II-D-93	WCI Steel, Incorporated, Warren, Ohio (no cover letter attached), July 20, 1992, ICR response.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-D**  
**EPA Correspondence From Outside Persons**

<u>Document No.</u>	<u>Description</u>
II-D-94	Page Aluminized Steel Corporation (no cover letter attached), to B. Jordan, EPA:ESD, July 21, 1992, ICR response.
II-D-95	A.R. Fritz, L-TEC Welding Materials plant, ESAB Welding Products, Incorporated, to B. Jordan, EPA:ESD, July 21, 1992, ICR response.
II-D-96	G. Janssen, DANA Corporation, Weatherhead Division, to B. Jordan, EPA:ESD, July 22, 1992, ICR response.
II-D-97	J. Traylinek, Valley City Steel Company, to B. Jordan, EPA:ESD, July 22, 1992, ICR response.
II-D-98	G. Whitmer, Alexander Whitmer Incorporated, to B. Jordan, EPA:ESD, July 23, 1992, ICR response for Wiremil, Incorporated.
II-D-99	G. Whitmer, Alexander Whitmer Incorporated, to B. Jordan, EPA:ESD, July 23, 1992, ICR response for Florida Wire and Cable Company.
II-D-100	P. Gorman, I/N TEK, to J. Crowder, EPA:ISB, July 23, 1992, Enclosing emission test for HCl and particulate emissions from descale pickling line stack and scrubber inlet/outlet, prepared by Mostardi-Platt Associates.
II-D-101	M. Sowa, Armco Advanced Materials Company, Butler Works plant, to B. Jordan, EPA:ESD, July 24, 1992, ICR response.
II-D-102	W. Riley, Bethlehem Steel Corporation, Sparrows Point plant, to B. Jordan, EPA:ESD, July 27, 1992, ICR response.
II-D-103	W. Riley, Bethlehem Steel Corporation, Lackawanna plant (No. 3 Continuous Pickler), to B. Jordan, EPA:ESD, July 27, 1992, ICR response.
II-D-104	W. Riley, Bethlehem Steel Corporation, Lackawanna plant (Galvanizing Mill), to B. Jordan, EPA:ESD, July 27, 1992, ICR response.
II-D-105	J. Fekete, Inland Steel Flat Products, Indiana Harbor Works plant, to B. Jordan, EPA:ESD, July 27, 1992, ICR response.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-D**  
**EPA Correspondence From Outside Persons**

<u>Document No.</u>	<u>Description</u>
II-D-106	R. Holcombe, Gulf States Steel, Incorporated, to B. Jordan, EPA:ESD, July 28, 1992, ICR response.
II-D-107	TriMas Corporation, Commonwealth Industries plant (no cover letter attached) to B. Jordan, EPA:ESD, July 28, 1992, ICR response.
II-D-108	J. Ireland, National Wire Products Industries, Incorporated, to B. Jordan, EPA:ESD, July 31, 1992, Response to ICR (Emission test, "Compliance HCl Emission Testing on the Wire Galvanizing Line at National Wire Products, Baltimore, Maryland," Air Techniques, Incorporated attached).
II-D-109	D. Hemmelgarn, Worthington Steel, to J. Crowder, EPA:ISB, July 31, 1992, Commenting on draft trip report and identifying certain information as CBI.
II-D-110	National-Standard Company (no cover letter attached), to B. Jordan, EPA:ESD, August 4, 1992, ICR response.
II-D-111	Centaur, Incorporated, Heidtman Steel Products, Granite City plant, to B. Jordan, EPA:ESD, August 6, 1992, ICR response.
II-D-112	J. K. Heintz, National Steel Corporation, Great Lakes Division, to B. Jordan, EPA:ESD, August 7, 1992, ICR response.
II-D-113	J. K. Heintz, National Steel Corporation, Granite City, to B. Jordan, EPA:ESD, August 7, 1992, ICR response.
II-D-114	J. K. Heintz, National Steel Corporation, American Steel Corporation plant, to B. Jordan, EPA:ESD, August 7, 1992, ICR response.
II-D-115	J. K. Heintz, National Steel Corporation, Midwest Steel Corporation plant, to B. Jordan, EPA:ESD, August 7, 1992, ICR response.
II-D-116	D. Long, Northwestern Steel and Wire Company, to B. Jordan, EPA:ESD, August 10, 1992, ICR response.
II-D-117	K. McMahon, USS-Posco Industries, to B. Jordan, EPA:ESD, August 17, 1992, ICR response.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-D**  
**EPA Correspondence From Outside Persons**

<u>Document No.</u>	<u>Description</u>
II-D-118	G. Sautter, Worthington Industries, Monroe, Ohio plant, to B. Jordan, EPA:ESD, August 18, 1992, ICR response.
II-D-119	G. Sautter, Worthington Industries, Porter, Indiana plant, to B. Jordan, EPA:ESD, August 18, 1992, ICR response.
II-D-120	M. Huether, Paulo Products Company - Memphis, Tennessee plant, to B. Jordan, EPA:ESD, August 20, 1992, ICR response.
II-D-121	M. Huether, Paulo Products Company, Murfreesboro, Tennessee plant, to B. Jordan, EPA:ESD, August 20, 1992, ICR response.
II-D-122	MCM Enterprises, Inc., Chicago Steel and Wire Company plant (no cover letter attached), to B. Jordan, EPA:ESD, August 31, 1992, ICR response.
II-D-123	J. Schindler, Bethlehem Steel Corporation - Burns Harbor, to B. Jordan, September 14, 1992, ICR response.
II-D-124	H. Chapp, Amber Plating Works, Incorporated, to B. Jordan, EPA:ESD, September 18, 1992, ICR response.
II-D-125	Double Eagle Steel Coating Company (Joint venture: US Steel and Rouge Steel Company) (no cover letter attached), to B. Jordan, EPA:ESD, September 22, 1992, ICR response.
II-D-126	J. N. Stone, Esco Engineering, to E. Kong, Research Triangle Institute, September 29, 1992, Enclosing a copy of the Dow technical bulletin entitled, "Continuous Pickling of Hot Rolled Steel Sheet with Hydrochloric Acid."
II-D-127	P. Gorman, I/N TEK, to J. Crowder, EPA:ISB, October 8, 1992, Enclosing emission test for particulate and HCl emissions from descale pickling line by Clean Air Engineering.
II-D-128	L. Hansen, Hansen Engineering, to E. Kong, Research Triangle Institute, October 15, 1992, Enclosing patent for in-line stack scrubber and test results.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-D**  
**EPA Correspondence From Outside Persons**

<u>Document No.</u>	<u>Description</u>
II-D-129	K. McMahon, USS-Posco Industries, to J. Maysilles, EPA:ESD, October 29, 1992, Commenting on draft trip report requesting CBI treatment of all process parameters, and opposing additional source test.
II-D-130	R. Welsh, Scientific Control Laboratories, Incorporated, to B. Jordan, EPA:ESD, November 2, 1992, ICR response for O&K American Corporation, Midway Wire Incorporated plant.
II-D-131	P. Gorman, I/N TEK, to J. Crowder, EPA:ISB, November 10, 1992, Enclosing emission test for descale pickling line.
II-D-132	K. M. Lenti, Magnetics International, Incorporated (a subsidiary of Inland Steel Industries, Incorporated), Iron Oxide Facility in Burns Harbor, Indiana, to B. Jordan, EPA:ESD, November 13, 1992, ICR response.
II-D-133	ATR Wire & Cable Co. Incorporated (no cover letter attached), to B. Jordan, EPA:ESD, December 17, 1992, ICR response.
II-D-134	J. Zak, Scientific Control Laboratories, Incorporated, to B. Jordan, EPA:ESD, December 29, 1992, ICR response for Riverdale Plating and Heat Treating, Incorporated.
II-D-135	K. Mills, United States Steel Corporation, to E. Kong, Research Triangle Institute, January 14, 1993, Enclosing test report, "A Gaseous Emission Study Performed for United States Steel Corporation at the Gary Works 80" and 84" Pickle Line Scrubbers on January 21 and February 12, 1992" by Mostardi-Platt Associates.
II-D-136	L. Keeney, Rouge Steel Company, to B. Jordan, EPA:ESD, January 22, 1993, ICR response.
II-D-137	P. Gorman, I/N TEK, to J. Maysilles, EPA:ISB, February 26, 1993, Enclosing emission test report for particulate and gaseous emissions from pickling line descale scrubber inlet and outlet at New Carlisle, Indiana facility performed by Mostardi-Platt Associates.
II-D-138	W. Schott, Kimre, Incorporated, to E. Kong, March 3, 1993, Enclosing information on HCl removal.



**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-D**  
**EPA Correspondence From Outside Persons**

<u>Document No.</u>	<u>Description</u>
II-D-139	K. McMahon, USS-Posco Industries, to J. Crowder, EPA:ISB, March 22, 1993, Transmitting comments on final trip report.
II-D-140	K. Addison, Mostardi-Platt Associates, Incorporated, to E. Kong, Research Triangle Institute, to E. Kong, Research Triangle Institute, April 15, 1993, Enclosing information on ppm concentrations for I/N TEK descale pickling line emission test.
II-D-141	A. Martin, Turnbull & Associates, Incorporated, to J. Maysilles, EPA:OAQPS:ESD, April 19, 1993, Enclosing 3 articles referenced in the Kimre HCl Emission Control information package.
II-D-142	A. Martin, Turnbull & Associates, Incorporated, to J. Maysilles, EPA:OAQPS:ESD, April 26, 1993, Enclosing 1 article used as Reference 1 in the Kimre HCl Emission Control information package (Note: article not in English).
II-D-143	K. Lenti, Magnetics International, Incorporated, to E. Kong, Research Triangle Institute, May 10, 1993, Enclosing emission test report for south roaster caustic scrubber, Magnetics International, Incorporated, Burns Harbor, Indiana, prepared by Roy F. Weston, Incorporated for Magnetics International, Incorporated, dated April 15, 1993.
II-D-144	K. Bialko, Bailey Engineers, to E. Kong, Research Triangle Institute, May 21, 1993, Enclosing data summary and test report, "Particulate, HCl, and Cl <sub>2</sub> Emission Tests Conducted on the Fume Scrubber in Fairfield, Alabama for Bailey Engineers on April 22, 1992," by Guardian Systems, Incorporated.
II-D-145	P. Merrywell, Magnetics International, to E. Kong, Research Triangle Institute, June 3, 1993, Enclosing additional information of 1987 test of scrubber for spray roaster.
II-D-146	R. Culp, Acme Steel Company, to J. Crowder, EPA:ISB, July 2, 1993, Enclosing comments on draft process description and data summary for use in emission test report for pickle line stack.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-D**  
**EPA Correspondence From Outside Persons**

<u>Document No.</u>	<u>Description</u>
II-D-147	K. Lenti, Inland Steel, to J. Maysilles, EPA:ISB, March 31, 1994, Enclosing emission test report for HCl acid stack test of iron oxide (acid regeneration) facility at Burns Harbor plant prepared by Clean Air Engineering.
II-D-148	P. Sutherland, Magnetics International, Incorporated, to J. Maysilles, EPA:ESD, July 6, 1994, Enclosing test report, "Draft Report on Hydrogen Chloride and Chlorine Removal Efficiency Testing for Plants A and B—Caustic Scrubber Inlet and Outlet at Magnetics International, Burns Harbor, Indiana" by Clean Air Engineering and additional background information.
II-D-149	J. W. Hall, National Galvanizing, H. S. Processing, to J. Maysilles, EPA:ISB, June 1, 1995, Enclosing stack test reports.
II-D-150	D. Colville, Research Triangle Institute, to Docket, December 19, 1995, List of companies requesting an extension to complete the ICR for Steel Pickling.
II-D-151	D. Colville, Research Triangle Institute, to Docket, December 19, 1995, List of companies not required to respond to the ICR.
II-D-152	E. Ellyatt, FL Department of Environmental Protection, to Docket, February 22, 1996, List of comments on the Presumptive MACT for the Steel Pickling-HCl Process Source Category.
II-D-153	S. Arnold, State of Colorado, Air Pollution Control Division, to Docket, February 28, 1996, List of comments on the Presumptive MACT for the Steel Pickling-HCl Process.
II-D-154	B. Frank Courtright, Maryland Department of the Environment, to Docket, March 14, 1996, List of concerns generated by the preliminary review of the MACT for HCl pickling.
II-D-155	B. Kossow, City of Toledo Department of Public Utilities, to Docket, March 15, 1996, List of comments on Steel Pickling Presumptive MACT.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-D**  
**EPA Correspondence From Outside Persons**

<u>Document No.</u>	<u>Description</u>
II-D-156	C. Millanti, Commonwealth of Kentucky, Department for Environmental Protection, to Docket, April 2, 1996, List of comments on the Draft presumptive steel pickling MACT standard.
II-D-157	J. Saitas, Texas Natural Resource Conservation Commission, to Docket, April 11, 1996, List of comments on the proposed MACT for Steel Pickling HCl Process.
II-D-158	T. Lopresti, KCH Services, Incorporated, to J. Maysilles, EPA:ISB, August 7, 1996, enclosing copy of typical startup and operations procedure and a trouble shooting chart for a packed tower scrubber.
II-D-159	J. McPhee, USS-Posco Industries, to J. Maysilles, EPA:ISB, November 27, 1996, enclosing test results from the original tests of USS-Posco Industries' HCl regeneration plant scrubber.
II-D-160	J. Green, Valley City Steel, to J. Maysilles, EPA:OAQPS:ESD, December 11, 1996, Enclosing Valley City Steel Company's Stack test for the new pickle line and new regeneration plant.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-E**

**EPA Memoranda of Meetings and Telephone Conversations With Outside Persons**

<u>Document No.</u>	<u>Description</u>
II-E-1	E. Kong, Research Triangle Institute, to A. Mattiussi, Nelson Steel, January 2, 1992, Record of telephone conversation regarding company's experiences in process design on emission controls for acid emissions from steel pickling operations.
II-E-2	E. Kong, Research Triangle Institute, to L.J. Hansen, Hansen Engineering, Incorporated, March 11, 1992, Record of telephone conversation regarding follow-up on the design of their in-line stack scrubber and its application on HCl emission reduction for steel pickling operations.
II-E-3	E. Kong, Research Triangle Institute, to D. Kallay, Heil Process Equipment/Xerxes Corporation, May 8, 1992, Record of telephone conversation regarding the selection of control systems for HCL acid emissions from steel pickling operations.
II-E-4	J. Turner, Research Triangle Institute, to N. Stone, Esco Engineering Co., September 23, 1992, Trends in pickling lines.
II-E-5	D. Chester, Research Triangle Institute, to S. Gusic, International Steel Services, Incorporated, August 30, 1995, Record of telephone conversation regarding information on acid regeneration process.
II-E-6	D. Chester, Research Triangle Institute, to P. Sutherland, Magnetics International, August 30-31, 1995, Record of telephone conversation regarding information on acid regeneration process.
II-E-7	D. Chester, Research Triangle Institute, to P. Bates, Arns Andritz-Ruthner, August 31, 1995, Record of telephone conversation regarding information on acid regeneration plants.
II-E-8	D. Chester, Research Triangle Institute, to L. Sadler, Magnetics International, August 31, 1995, Record of telephone conversation regarding information on acid regeneration operations.
II-E-9	D. Chester, Research Triangle Institute, to J. Malloch, Magnetics International, August 31, 1995, Record of telephone conversation regarding information on acid regeneration operations.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-E**

**EPA Memoranda of Meetings and Telephone Conversations With Outside Persons**

- II-E-10 D. Chester, Research Triangle Institute, to T. Shepker and R. McCoy, WCI Steel, August 31, 1995, Record of telephone conversation regarding information on acid regeneration emissions.
- II-E-11 D. Chester, Research Triangle Institute, to J. Traylinck, Valley City Steel, August 31-September 1, 1995, Record of telephone conversation regarding information on acid regeneration process and emissions.
- II-E-12 D. Chester, Research Triangle Institute, to J. Greene, Valley City Steel, September 1, 1995, Record of telephone conversation regarding test data.
- II-E-13 D. Chester, Research Triangle Institute, to B. Beske, September 5, 1995, Record of telephone conversation regarding information of plant and process being build for Valley City Steel.
- II-E-14 D. Chester, Research Triangle Institute, to K. Bialko, Bailey Engineers, September 5-6, 1995, Record of telephone conversation regarding information on acid regeneration emissions and process.
- II-E-15 D. Chester, Research Triangle Institute, to K. McMahon, USS-Posco Industries, September 6, 1995, Record of telephone conversation regarding information on acid regeneration process and emissions.
- II-E-16 D. Chester, Research Triangle Institute, to S. Felton, ARMCO Steel (AK Steel), September 11, 1995, Record of telephone conversation regarding information on acid regeneration facility.
- II-E-17 D. Chester, Research Triangle Institute, to S. Gusic, International Steel Services, Incorporated (ISS), September 12, 1995, Record of telephone conversation regarding information on propriety of Ruthner process.
- II-E-18 J. Turner, Research Triangle Institute, to Lou Colonna, Tess-Comm (Regarding Chlorine Monitors), November 5, 1996, Record of telephone conversation concerning the installation of HCl or Cl<sub>2</sub> sensors.
- II-E-19 J. Turner, Research Triangle Institute, to Bill Brain, MSA, November 5, 6, 7, 1996, Record of telephone conversation regarding continuous monitors for HCl and Cl<sub>2</sub>.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-E**

**EPA Memoranda of Meetings and Telephone Conversations With Outside Persons**

- II-E-20 J. Turner, Research Triangle Institute, to Kim Chaffee, Wheelabrator-Altech/Perkin Elmer, November 11, 1996, Record of telephone conversation regarding information on instrument for HCl costs.
- II-E-21 J. Turner, Research Triangle Institute, to Phil Harris, Bover Western Research, November 12, 1996, Record of telephone conversation regarding information on their instrument for HCl or Cl<sub>2</sub> in ultraviolet absorption spectroscopy.
- II-E-22 J. Turner, Research Triangle Institute, to Kirk Webber, Molecular Analytics (formerly ETG), November 12, 1996, Record of telephone conversation regarding information on their use of 2 ion mobility spectrometers, one for HCl and the other for Cl<sub>2</sub>.
- II-E-23 J. Turner, Research Triangle Institute, to S. Gusic, International Steel Services and American Iron Oxide Company, December 6, 1996, Record of telephone conversation regarding how to measure excess air in HCl acid regeneration.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-F**  
**Interagency Review Materials**

<u>Document No.</u>	<u>Description</u>
II-F-1	Memorandum, J. B. Rasnic, EPA:Manufacturing, Energy and Transportation Division Office of Compliance, to J. Maysilles, EPA:OAQPS:ESD:MG, Review of Presumptive MACT for the Steel Pickling - HCl Process Source Category, undated.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-I**  
**References *Not* Readily Available to the Public Elsewhere**

<u>Document No.</u>	<u>Description</u>
II-I-1	Permit application, Pickle Line Scrubber General Information and Emission Test, National Steel, Granite City, undated.
II-I-2	Paper, Chlorine Control of Pickling Acid Regeneration Plant, E. Herpers, B. Schweinsberg, N. Ozer, and J. Bozcar in I. Chem. E. Symposium Series No. 57, undated, pp. BB1-BB14.
II-I-3	Paper, Acid Pickling of Copper Rod With No Effluent at Canada Wire & Cable, Montreal, Canada, J.N. Stone, Ledge Engineering, Incorporated, and R.J. Corcoran, S. J. Jaczek, and W. A. Jones, Canada Wire & Cable Company, Limited, undated.
II-I-4	Text, Exhaust Systems, Chapter 28, in Electroplating Engineering Handbook, A.D. Brandt and D.M. Anderson, undated, pp. 638-651.
II-I-5	Vendor brochures, Model 745 continuous gas analyzer for process environmental toxic gases (HCl, HF, F <sub>2</sub> , NH <sub>3</sub> , ClO <sub>2</sub> , Br, Cl <sub>2</sub> , and UHF <sub>6</sub> ) by TESS-COM, Incorporated and Sensidyne/Gastec precision gas detection system, undated.
II-I-6	Text, Chemical Engineer's Handbook, fourth edition, R.H. Perry, C.H. Chilton, and S.D. Kirkpatrick, eds., McGraw-Hill Book Company, New York, 1963, p. 3-61.
II-I-7	Article, A New Approach to Consumer Theory, Kelvin J. Lancaster, Journal of Political Economy, vol. 74, 1966, pp. 132-157.
II-I-8	Article, Performance of Commercially Available Equipment in Scrubbing Hydrogen Chloride Gas, S.K. Kempner, and E.N. Seiler, Western Electric Company, and D.H. Bowman, Purdue University, in Journal of the Air Pollution Control Association, 20(3), March 1970, pp. 139-143.
II-I-9	Text, Encyclopedia of Occupational Health and Safety, McGraw-Hill Book Company, New York, Vol. 1 (A-K), 1971.
II-I-10	Article, Recovery and Recycling of Waste Acid From Steel Pickling Operations, J. Dempster and H. Goma, Wire Journal, vol. 6, April 1973, pp. 63-66.



**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-I**  
**References *Not* Readily Available to the Public Elsewhere**

<u>Document No.</u>	<u>Description</u>
II-I-11	Text, Chlorine and Hydrogen Chloride, National Academy of Sciences, Washington, D.C., 1976, pp. 85-86, 93, and 145-198.
II-I-12	Scrubber Efficiency Study for Curtis Processing Company, Troy, Michigan, August 20, 1979.
II-I-13	Article, Design Your Pickle Line for Pollution Control, J.N. Stone, ESCO Engineering, Presented at 49th Annual Convention Wire Association International in Toronto, October 21-25, 1979.
II-I-14	Presentation, Economical Fume Control in Pickle Houses, J.N. Stone, presented at 50th Annual Wire Association International Convention, Cincinnati, Ohio, October 5-9, 1980.
II-I-15	Article, "Part III: Estimating the Size and Cost of Pollutant Capture Hoods," W.M. Vataavuk and R.B. Neverial, Chemical Engineering, December 1, 1980, pp. 111-115.
II-I-16	Article, "Part IV: Estimating the Size and Cost of Duct Work," W.M. Vataavuk and R.B. Neverial, Chemical Engineering, December 29, 1980, pp. 71-73.
II-I-17	Referenced Text, Surface Cleaning, Finishing, and Coating, in Metals Handbook, Ninth edition, Volume 5, American Society for Metals, 1982, p. 11.
II-I-18	Referenced Text, Perry's Chemical Engineers' Handbook, Sixth edition, McGraw-Hill Book Company, 1984, p. 3-64.
II-I-19	Referenced Text, Protection and Competition in the U.S. Steel Market: A Study of Managerial Decision Making in Transition (Monograph No. 30), Hans Mueller, Middle Tennessee State University, Business and Economics Research Center, Murfreesboro, Tennessee, May 1984.
II-I-20	Text, Sieve Tray Design, J.N. Stone, in ACCESS, Leds Publishing Company, November/December 1984, pp. 10-20.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-I**  
**References *Not* Readily Available to the Public Elsewhere**

<u>Document No.</u>	<u>Description</u>
II-I-21	Text, The Making, Shaping, and Treating of Steel, Tenth edition, Association of Iron and Steel Engineers, 1985, pp. 1984-1085.
II-I-22	Text, Commercial Loan Officer's Handbook, Robert H. Behrens, Banker's Publishing Company, Boston, 1985.
II-I-23	Text, The Competitive Status of the U.S. Steel Industry: A Study of the Influences of Technology in Determining International Industrial Competitive Advantage, National Academy Press, Washington, D.C., 1985.
II-I-24	Article, Modern Pickling Techniques, G. Hitzemann and J. Heimhard, Keramchemie GmbH, Metallurgical Plant and Technology, February 1986, pp. 67-73.
II-I-25	Product bulletin, Crown Recovery Systems, Acid Recovery Systems, Incorporated, Lenexa, Kansas, 1987.
II-I-26	Text, Minimills and Integrated Mills: A Comparison of Steelmaking in the United States, Washington, D.C. Health and Company, Lexington, Massachusetts, 1987.
II-I-27	Construction permit, Continuous cold mill facility I/N TEK, New Carlisle, Indiana, October 15, 1987.
II-I-28	Report of Determination of Emissions at Spang and Company, Magnetics Division-Metal Oxide Plant, Booneville, Arkansas, prepared by Environmental Services, Company, Incorporated, November 18-19 1987.
II-I-29	Technical Paper, Descaling of Carbon Steel Rod and Wire, J. N. Stone, Ledge Engineering, Incorporated, presented at WIRETECH '88, February 16-18, 1988.
II-I-30	Report, Results of Stack Sampling for Voss Steel Corporation, Taylor, Michigan, Dell Engineering, Incorporated, July 1988.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-I**  
**References *Not* Readily Available to the Public Elsewhere**

<u>Document No.</u>	<u>Description</u>
II-I-31	Text, Small Business Management Fundamentals, 5th Edition, D. Steinhoff, and J.F. Burgess, McGraw-Hill Book Company, New York, 1989.
II-I-32	Report, Estimates of HCl Emissions from Nelson Steel Standard Push-Pull Pickle Line at Nelson Steel, Stoney Creek, Ontario, Prepared by Esco Engineering, June 1989.
II-I-33	Article, Heidtman Steel Breaks Ground for Its Fourth Pickling Facility, American Metal Market, Vol. 97 (124), June 27, 1989, p. 3.
II-I-34	Article, Productivity improvements through recovery of pickle liquors with the APU process, Iron and Steel Engineer, January 1990, pp. 55-60.
II-I-35	Statistical Data, SIC 33, U.S. Department of Labor, Bureau of Labor Statistics, January 1990-1993.
II-I-36	Report, Results of the January 15, 1990 Hydrogen Chloride/Hydrochloric Acid Emission Test on the Etcher Exhaust Duct at the Hutchinson Technology Plant, prepared for Hutchinson Technology by Interpoll Laboratories, Incorporated, January 22, 1990.
II-I-37	Letter and attachment, D. Kallay, Xerxes Corporation, to Warren Consolidated rolling and Finishing, May 16, 1990, enclosing report on Balancing Fume Exhaust System for Warren Consolidated (1991 field investigation reports attached).
II-I-38	Report to Esco Engineering on Hydrogen Chloride Samples Collected at Worthington Steel Corporation, Monroe, Ohio, prepared by Affiliated Environmental Services, Incorporated, December 5, 1990.
II-I-39	Presentation, Pickle Line Fume Control With Plate Scrubbers, J.N. Stone, presented at the AISE Conference, Pittsburgh, 1991.
II-I-40	Text, Restructuring the U.S. Steel Industry: Semi-Finished Steel Imports, International and U.S. Adaptation, Jose Guilherme de Heraclito Lima, Westview Press, 1991, p. 67.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-I**  
**References *Not* Readily Available to the Public Elsewhere**

<u>Document No.</u>	<u>Description</u>
II-I-41	Particulate and Gaseous Emission Study: I/N TEK, New Carlisle, Indiana, Mostardi-Platt Associates, January 18, 1991.
II-I-42	Text. 1987 Census of Manufacturers Industry Series: Type of Organization, U.S. Department of Commerce, Government Printing Office, Washington, D.C., February 1991.
II-I-43	Sieve Tray Scrubber Performance (HCl), Xerxes Corporation/Heil Process Equipment, March 4, 1991.
II-I-44	Article, Design Installation and Start-Up of I/N Tek, R.A. Joyce, Inland Steel Company, Iron and Steel Engineer, May 1991, pp. 15-21.
II-I-45	Article, AQUATECH Systems' Pickle Liquor Recovery Process--Washington Steel Reduces Waste Disposal Costs and Liability, J.C.McArdle, J.A. Piccari, Allied-Signal Incorporated, and G.G. Thornburg, Washington Steel Corporation, Iron and Steel Engineer, May 1991, pp. 39-43.
II-I-46	Article, Pickling of Hot Rolled Strip: An Overview, R.M. Hudson, Iron and Steelmaker, vol. 18(9), September 1991, p. 31-32.
II-I-47	HCl Efficiency Studies Conducted on the Inlet and Outlet of the Pickle Line Scrubber Located in Gadsden, Alabama for Gulf States Steel Corporation, Guardian Systems, September 27, 1991.
II-I-48	Scrubber performance certification test program: pickling lime fume scrubber stack, Worthington Steel, Incorporated, Porter, Indiana, prepared by ARI Environmental, Incorporated for Worthington Steel, Incorporated, November 12-13, 1991.
II-I-49	Letter and attachments, J. Sullivan, ECO-TEC, Incorporated, to J. Cole, Research Triangle Institute, November 13, 1991, enclosing literature describing Eco-Tec's acid purification systems and their application in the steel industry.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-I**  
**References *Not* Readily Available to the Public Elsewhere**

<u>Document No.</u>	<u>Description</u>
II-I-50	Method 421, Determination of Gaseous Chloride and Fluoride in Emissions from Stationary Sources, State of California Air Resources Board, December 13, 1991, pp. 421-1 through 421-20.
II-I-51	Report, Statistical Abstract of the U.S., 112th edition, U.S. Department of Commerce, Government Printing Office, Washington, D.C., 1992.
II-I-52	Text, Air Pollution Engineering Manual, A.J. Buonicore and W.T. Davis, Air and Waste Management Association, Van Nostrand Reinhold, New York, 1992.
II-I-53	Letter and attachment, G. Current, Weirton Steel Corporation, to G. Farley, West Virginia Air Pollution Control Commission, January 17, 1992, enclosing report entitled, "Compliance Demonstration Results for Hydrochloric Acid from Regeneration Unit No. 3 at Weirton Steel Corporation, Weirton, West Virginia," prepared by Keystone Environmental Resources, Incorporated.
II-I-54	Letter, B. Hunter, Hayden Environmental Group, Incorporated, to K. Krause, QSource Engineering, Incorporated, January 20, 1992, Enclosing tables summarizing testing performed at Valley City Steel on December 19, 1991.
II-I-55	Text, Census of Manufactures Industry Series: Concentration Ratios in Manufacturing, U.S. Department of Commerce, Government Printing Office, Washington, D.C., February 1992.
II-I-56	Scrubber performance certification test program: pickling line fume scrubber stack, Worthington Steel, Incorporated, Porter, Indiana, prepared by ARI Environmental, Incorporated for Worthington Steel, Incorporated, February 4, 1992.
II-I-57	Report, Compliance HCl emissions Testing on the Wire Galvanizing Line at National Wire Products, Baltimore, Maryland, Air Techniques, Incorporated, April 1-2, 1992.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-I**  
**References *Not* Readily Available to the Public Elsewhere**

<u>Document No.</u>	<u>Description</u>
II-I-58	Letter and attachment, Environmental Monitoring Laboratories, Incorporated, to Kerr McGee Chemical Corporation, May 23, 1992, enclosing report on Particulate/HCl-Cl <sub>2</sub> Emission Tests for Kerr McGee Chemical Corporation, Hamilton, MI (fume washer stack and sump scrubber stack).
II-I-59	Hydrochloric Acid, Printout from Hazardous Substances Data Bank (HSDB), National Library of Medicine, August 31, 1992.
II-I-60	Report, Standard and Poor's Industry Surveys, Steel and Heavy Machinery: Basic Analysis, vol. 160(52), December 24, 1992.
II-I-61	Printout, Fourier Transform Infrared (FTIR) Detectable Compounds, EPA:EMB, December 24, 1992.
II-I-62	Text, Metal Statistics: 1993, American Metal Market, Chilton Publications, New York, 1993.
II-I-63	Text, Means Building Construction Cost Data, 51st Annual Edition, R.S. Means Company, Incorporated, 1993.
II-I-64	Report, American Iron and Steel Institute (AISI), annual statistical report, 1993.
II-I-65	Report, Stationary Source Sampling Report: Emission Test for Hydrogen Chloride from Secondary Scrubber Inlet and Outlet at Goodyear Tire and Rubber Company, Randleman, North Carolina, January 21, 1993.
II-I-66	Publication, Steel: Semiannual Monitoring Report, Special Focus: U.S. Industry Conditions, Publication 2655, U.S. International Trade Commission, Washington, D.C., June 1993.
II-I-67	Article, HCl as complex as ever: tightness can't last, Paul Kemiezis, Chemical Week, vol. 152(23), June 16, 1993, pp. 67-68.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-I**  
**References *Not* Readily Available to the Public Elsewhere**

<u>Document No.</u>	<u>Description</u>
II-I-68	Publication, Certain Flat-Rolled Carbon Steel Products from Argentina, Australia, Austria, Belgium, Brazil, Canada, Finland, France, Germany, Italy, Japan, Korea, Mexico, the Netherlands, New Zealand, Poland, Romania, Spain, Sweden, and the United Kingdom, in Volume II: Information Obtained in the Investigation, Publication No. 2664, U.S. International Trade Commission, Washington, D.C., August 1993, p. 20.
II-I-69	Chlorine, Printout from Hazardous Substances Data Bank (HSDB), National Library of Medicine, August 18, 1993.
II-I-70	Text, World-Wide Limits for Toxic and Hazardous Chemicals in Air, Water, and Soil, Marshal Sitig, Noyes Publications, Park Ridge, New Jersey, 1994.
II-I-71	Text, Chapter 3, "Local Exhaust Hoods" and Chapter 5, "Exhaust System Design Procedure," in Industrial Ventilation, A Manual of Recommended Practice, 22nd Edition, American Conference of Governmental Industrial Hygienists, Cincinnati, Ohio, 1995.
II-I-72	Hydrogen Chloride, Printout from Integrated Risk Information Systems (IRIS), U.S. EPA, July 10, 1995.
II-I-73	Chlorine, Printout from Integrated Risk Information Systems (IRIS), U.S. EPA, September 1, 1995.
II-I-74	D. Sulc, Nucor Steel, Indiana plant, to D. Chester, Research Triangle Institute, September 14, 1995, Acid regeneration test results.
II-I-75	Steel Prices, American Metal Market, March 29, 1996.
II-I-76	Technical Paper, Treatment of Halogenated Organic Vent Streams for the Reduction of Air Emissions, R. Bailey and J. Phillips, Air & Waste Manage. Assoc., vol. 46, May 1996, pp. 458-463.
II-I-77	Letter, K. Kunaniec, Bay Area Quality Management District, to USS Posco Industries, September 23, 1996, enclosing results of source test that this district conducted on July 24, 1996, at the Acid Pickling Line and Iron Oxide Roadter.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-I**  
**References *Not* Readily Available to the Public Elsewhere**

<u>Document No.</u>	<u>Description</u>
II-I-78	Memorandum, J. Turner, Research Triangle Institute, to Docket, Information Collection Request (ICR) Database (2 Diskettes), November 20, 1996.
II-I-79	Memorandum, J. Turner, Research Triangle Institute, to Docket, Esco Model for Estimating Emissions from Tanks (1 Diskette), November 20, 1996.
II-I-80	Memorandum, J. Turner, Research Triangle Institute, to Docket, Impacts Model for Steel Pickling (Excel Format - 1 Diskette), March 14, 1997.



**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category II**  
**Items Considered in Developing Proposal**  
**Subcategory II-J**  
**Miscellaneous *Federal Register* Notices Published During Proposal Development**

<u>Document No.</u>	<u>Description</u>
II-J-1	59 FR 19306-19323, <i>Federal Register</i> , Standards of Performance for New Stationary Sources; Appendix A-Test Methods; Revisions to Methods 18 and 26 and Addition of Tests Methods 25D and Addition of Test Method 26A, April 22, 1994.
II-J-2	59 FR 58200-58201 and 58272-58273, <i>Federal Register</i> , Semiannual Regulatory Agenda, 4160. NESHAP-Steel Pickling, HCl Process, November 14, 1994.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category III**  
**Proposal**  
**Subcategory III-A**  
**Notice of Proposed Rulemaking**

<u>Document No.</u>	<u>Description</u>
III-A-1	Signature Package–Proposed Preamble, Regulation, and SF-83 and supporting statements–National Emissions Standards for Hazardous Air Pollutants for Source Categories; National Emission Standards for Hazardous Air Pollutants for Steel Pickling Facilities–HCl Process.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category III**  
**Proposal**  
**Subcategory III-B**  
**Proposed Support Document**

Document No.

Description

III-B-1

National Emission Standards for Hazardous Air Pollutants (NESHAP) for Steel Pickling–HCl Process–Background Information for Proposed Standards, Publication No. EPA-453/R-97-012, June 1997.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category IV**  
**Additional Items Considered after Proposal, in Developing Final Rule**  
**Subcategory IV-D**  
**Additional Correspondence Received**

<u>Document No.</u>	<u>Description</u>
IV-D-1	Letter, J. Malloch, Magnetics International, to J. Maysilles, EPA:OAQPS:ESD:MG, November 13, 1997, Comments on proposed NESHAP for steel pickling facilities – HCl process.
IV-D-2	Letter, M. Johnston, Worthington Industries, to J. Maysilles, EPA:OAQPS:ESD:MG, November 12, 1997, Comments on proposed NESHAP for steel pickling facilities – HCl process.
IV-D-3	Letter and attachment, D. Sulc, Nucor Steel, to J. Maysilles, EPA:OAQPS:ESD:MG, November 14, 1997, Enclosing comments on proposed NESHAP for steel pickling facilities – HCl process.
IV-D-4	Letter, M. Wax, Institute of Clean Air Companies, to Docket, November 17, 1997, Comments on proposed NESHAP for steel pickling facilities – HCl process.
IV-D-5	Letter, S. Peirce-Sandner, Kodak Park Environmental Services, Eastman Kodak Company, to Docket, November 14, 1997, Comments on proposed NESHAP for steel pickling facilities – HCl process.
IV-D-6	Letter, A. Hall, Wheatland Tube Company, to Docket, November 14, 1997, Comments on proposed NESHAP for steel pickling facilities – HCl process.
IV-D-7	Letter and attachment, C. Thompson, Collier, Shannon, Rill, & Scott, to Docket, November 17, 1997, Enclosing comments on proposed NESHAP for steel pickling facilities – HCl process on behalf of Specialty Steel Industry of North America.
IV-D-8	Letter, W. Sieckman, International Steel Services, Incorporated, to Docket, November 17, 1997, Comments on proposed NESHAP for steel pickling facilities – HCl process.
IV-D-9	Letter and attachment, C. Thompson, Collier, Shannon, Rill, & Scott, to Docket, November 17, 1997, Enclosing comments on proposed NESHAP for steel pickling facilities – HCl process on behalf of Steel Manufacturers Association.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category IV**  
**Additional Items Considered after Proposal, in Developing Final Rule**  
**Subcategory IV-D**  
**Additional Correspondence Received**

<u>Document No.</u>	<u>Description</u>
IV-D-10	Letter, D. Holmberg, ACME Steel Company, to Docket, November 17, 1997, Comments on proposed NESHAP for steel pickling facilities – HCl process.
IV-D-11	Letter, B. Steiner, American Iron and Steel Institute, to Docket, November 17, 1997, Comments on proposed NESHAP for steel pickling facilities – HCl process.
IV-D-12	Letter, G. Allie, Inland Steel Company, Indiana Harbor Works, to Docket, November 17, 1997, Comments on proposed NESHAP for steel pickling facilities – HCl process.
IV-D-13	Facsimile, J. Saligoe, Indiana Department of Environmental Management, Air Programs, to J. Maysilles, EPA:OAQPS:ESD:MG, November 17, 1997, Enclosing Letter, F. George, Indiana Department of Environmental Management, to C. Browner, EPA, November 17, 1997, Comments on proposed NESHAP for steel pickling facilities – HCl process.
IV-D-14	Electronic mail and attachment, J.N. Stone, Esco Engineering, to Docket, October 21, 1997, Enclosing comments on proposed NESHAP for steel pickling facilities – HCl process.
IV-D-15	Letter, R. Colby and B. Higgins, STAPPA/ALAPCO, to Docket, November 25, 1997, Comments on proposed NESHAP for steel pickling facilities – HCl process.
IV-D-16	Letter and attachments, C. Thompson, Collier, Shannon, Rill, and Scott, PPLC, to J. Maysilles, EPA:OAQPS:ESD:MG, March 11, 1998, Enclosing two HCl emission reports prepared on behalf of ARMCO, Incorporated.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category IV**  
**Additional Items Considered after Proposal, in Developing Final Rule**  
**Subcategory IV-E**  
**EPA Memoranda of Meetings and Telephone Conversations**

<u>Document No.</u>	<u>Description</u>
IV-E-1	Telephone Contact Summary, J. Turner, RTI, with H. Naour, Illinois EPA, March 31, 1998, To ask for clarification of STAPPA/ALAPCO comments on steel pickling.
IV-E-2	Telephone Contact Summary, J. Turner, RTI, with M. Biesterfeld, Heil-Xerxes Scrubber Company, April 2, 1998, To ask about the effects of mixed acids on HCl scrubbing.

**Docket No. A-95-43**  
**HCl Steel Pickling NESHAP**  
**Category IV**  
**Additional Items Considered after Proposal, in Developing Final Rule**  
**Subcategory IV-G**  
**Late Public Comments Received**

Document No.

Description

IV-G-1